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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of	)	DA 11-131
	)	
Unlicensed Operation in the TV Broadcast Bands	)	ET Docket No. 04-186
	)	

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COMMENTS OF LS TELCOM

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28th February, 2011

1 INTRODUCTION

1.1   LS telcom would like to thank the Federal Communications Commission for the opportunity for further reply in the matter of administration of a TV bands database and are pleased to file our comments in this matter.

1.2   LS telcom would also like to thank the FCC for conditionally designating LS telcom as a TV bands device database administrator.

1.3   For the avoidance of unnecessarily complicating this reply LS telcom are providing these comments based as an addendum to our original submission dated 4 January 2010 and Supplemental information submission dated 23 February 2010.

1.4   This submission specifically addresses the issues raised in FCC Order DA 11-131 seeking reply on matters raised in the second MO&O in ET Docket No. 04-186.

2 BACKGROUND

2.1   LS telcom is an established international supplier of spectrum management software, services and consultancy to over 80 National Regulators as well as many other Government and Civilian services. As such the ability of LS telcom to develop and support the TV bands database is second to none. LS telcom can comply with the changes as specified by the Office of Engineering Technology and wishes to remain engaged as these changes develop.

2.2   LS telcom believes that plurality of service provider is key to consumer choice and fair competition. To ensure that the interfacing of both the intra-database exchange and the device to database exchange develop in a common standard LS telcom is actively involved with all other conditionally designated administrator parties. LS telcom will also attend and engage with workshops and other meetings as requested by the OET, or other parties.

3 RESPONSES TO RULE CHANGES

3.1   In response to changes in §15.713;

3.1.1   (a)(1)   All communications between the TVBD and LS telcom TV bands database will employ suitable transport level encryption such as TLS, but yet to be determined between database administrators and manufacturers of TVBDs. Non-repudiation mechanisms will be employed to compare the requesting TVBD FCC ID to a lookup table of authorized FCC Ids to assure validity of authorization of the Mode II and Mode I device. Also security mechanisms against fraudulent alteration of database content and empty channel lists will be incorporated.

3.1.2   (c) (1),(2) & (d) LS telcom comply with these changes to propagation / interference protection measures as the database and underlying technologies use established mechanisms for calculating both propagation, temporal and spacial limits for authorizing licenses. As an established supplier of National regulatory licensing systems the ability to adapt to these changes is intrinsic to the offering.

3.1.3   (e) (1),(2),(3),(4),(5) LS telcom can comply with these changes, however we note that the specific mechanism of exchange of all these datatypes is yet to be defined between TVDB manufacturers and database administrators.

3.1.4   (e) (6) LS telcom will comply with the need for verification of the fixed device HAAT. The system will compute the theoretical HAAT as per §73.684(d) and only deliver an authorization to the requesting device subject to the provision of this section. That method of authorization will be in the same format as noted in §15.713.

3.1.5   (f) (3) (i...ix) LS telcom will comply with these data requirements and is working in co-operation with all other conditionally designated TV band database administrators to establish the format and commonality of this data.

3.1.6   (h) (1) (i...vii) LS telcom will comply with these requirements. The LS telcom system has established mechanisms for delivering spatial, temporal and licensing comparative examination, and these allow for the border areas to be defined within the database. In terms of checking multiple records for an individual license the internal logic of the database can be adapted through the "wizard" mechanism to ensure that only the most recent records are utilized within the TV bands database for making assignment decisions.

3.1.7   (h) (6) (i...v), (7) (i...v) The provision of registering MVPD and Television translator sites will be by means of a secure web based self registration. This self registration form will capture the information as set out in these sections and maintain the record in the database. Automatic comparison to computed protected contours will advise applicants whether there is no need for registration of their location.

3.1.8   (h) (8) (i...viii) The registration of data for LPAS devices will take the same format as self registration by secure web form capture as in the above paragraph. If no re-registration is undertaken at the end of the validity period, the location / equipment details will be removed from the TV database and email sent to the LPAS registrant advising of this (revoked) status.

3.1.9   (h) (9) (i...viii)   The registration of large events and venues will take a similar format to the above two paragraphs however in this matter the first step will be the registration of an authorized agent to act on behalf of the event

location. This will assure that the event location is valid and provide a mechanism of ensuring that the two available reserved channels have been fully utilized first before entering additional requests and demands upon the TV band database. The registration of an authorized agent will be by means of a web based form. Once registered only applications from that agent for the specified event location(s) will be accepted when registering additional devices in the TV bands database. LS telcom propose this mechanism to ensure efficient and duly considered applications are received for large events and venues.

3.1.10   (j) (i...iii) LS telcom will employ standard security, encryption and non repudiation mechanisms within the database. To ensure this becomes a standard and interoperable set of mechanisms LS telcom is working with the other conditionally designated database administrators.

3.2   In response to changes in §15.714

3.2.1   (a) Noted.

3.3   In response to changes in §15.715

3.3.1   (C...I) Noted and compliant. LS telcom welcomes the plurality of service to the consumer and will work in co-operation with other conditionally designated database administrators to ensure that the items in this section regarding interaction, security and completeness of data are common and applied.

4 SUMMARY

4.1   This document files with the FCC LS telcom's response to docket DA 11-131. In considering the individual requests of paragraph 19:-

4.2   LS telcom's supplementary comments to the second MO&O are described at section 3 above. Please note that this document is to be read in conjunction with the initial response to ET Docket No. 04-186 and Supplemental response 100223 by LS telcom for a full understanding of the LS telcom proposal.

4.3   LS telcom will attend workshops as detailed by the OET. The persons designated to attend such workshops are..Dr. –Ing. G Schöne, R Thelen-Bartholomew, S Georgi, all of LS telcom.

4.4   LS telcom welcomes the opportunity to work in partnership with the OET and other conditionally designated database administrators to develop the database, its operation and security features.

4.5   LS telcom agrees with this statement regarding anticompetitive practices and data privacy matters.

4.6   LS telcom looks forward to working with the OET and other partners in developing a world class solution.